

Wildlife and
Countryside



**Consultation on a New Planning Policy Statement 7 (PPS7)
Sustainable Development in Rural Areas:**

Response by Wildlife and Countryside Link



British Ecological Society



**BUTTERFLY
CONSERVATION**



Campaign to Protect
Rural England



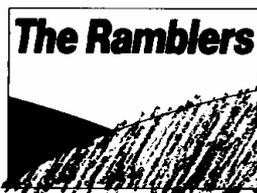
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Wildlife and Countryside Link
89 Albert Embankment, London SE1 7TP

T: 020 7820 8600
F: 020 7820 8620
E: enquiry@wcl.org.uk
W: www.wcl.org.uk

"Bringing voluntary organisations in the UK together to protect and enhance wildlife and landscape, and to further the quiet enjoyment and appreciation of the countryside"

Chairman: Tony Burton, Director: Pippa Langford

Wildlife and Countryside Link (WCL) Limited Company No. 3889519

Consultation on a New Planning Policy Statement 7 (PPS7) Sustainable Development in Rural Areas:

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INTRODUCTION

1. The Government has set out to review all its planning policy guidance; to establish whether or not it is needed; to achieve greater clarity; and to remove from national policy guidance advice on practical implementation and policies which it believes should be expressed elsewhere. The Government has carried out a review of Planning Policy Guidance note 7 (PPG7), *The Countryside- Environmental Quality and Economic and Social Development* (February 1997).

2. Wildlife and Countryside Link (Link) brings together 33 voluntary organisations concerned with the conservation, protection and enhancement of wildlife and the countryside. Link members practise and advocate environmentally sensitive land management and food production and encourage respect for and enjoyment of natural landscapes and features, the historic environment and biodiversity. Taken together, our members have the support of almost 7 million people in the UK, have a turnover of over £700 million and manage over 398,000 hectares of land. **This response is supported by the British Ecological Society, the British Mountaineering Council, Butterfly Conservation, the Campaign to Protect Rural England, the Council for British Archaeology, the Council for National Parks, Friends of the Earth, the Herpetological Conservation Trust, the Open Spaces Society, the Ramblers Association, the Wildlife Trusts and the Woodland Trust.**

OVERVIEW

3. Link welcomes the acceptance by the Government that the broad planning policy framework provided by PPG7 remains appropriate and that there remains a strong requirement for a distinct set of national planning policies that address the particular circumstances of “rural areas and the wider countryside”.

4. In the view of Link, however, draft PPS7 fails to achieve greater clarity, weakens some crucial elements of PPG7 and introduces a confusing array of aspirations and contradictions. It is a document that is open to widely varying interpretation. The draft PPS7 damages the broad planning framework established by PPG7 and does not succeed in providing a distinct set of planning policies that address the particular circumstances of the countryside nor the wildlife within it.

5. A most serious flaw at the heart of the draft PPS7 is the reliance on a badge of sustainability, which is neither adequately defined nor applied with any consistency in the draft document. The Government’s use of the terms “sustainable” and “sustainability” throughout its draft Planning Policy Statements is so loose that its effect and usefulness is derisory. The bulk of draft PPS7 shows all too clearly how dangerous is such licence in the use of this term. If the term is to have any status or currency, it must be defined to the satisfaction of a representative and wide spectrum of stakeholders. If it is not defined in such a way in PPS7, there should be a clear cross-reference to a definition found elsewhere in draft PPS, probably PPS1. Link has previously submitted its views to Government on planning for sustainable development, in the paper PRINCIPLES OF PLANNING FOR SUSTAINABLE DEVELOPMENT - PPS1, which is attached as an appendix to this response.

6. Link considers that the unsatisfactory nature of the definition of sustainability in draft PPS7 is compounded by the weakness in clause 38 of the Planning and Compulsory Purchase Bill, currently before Parliament. Link supports an amendment to this clause to strengthen the obligation on local authorities, amongst others, to pursue sustainability objectives in development plans. The fact remains that unless sustainability is properly defined in policy, much of draft PPS7 remains compromised to the point of being ineffective. The Government's intentions remain obscure.

7. Another grave concern of Link is that there is no clear recognition in draft PPS7 of the Environmental Considerations for Development Plans, which are presently contained within PPG12 (4.4), insofar as they apply to the countryside. These considerations include: noise and light pollution; conservation and enhancement of wildlife habitats and species; the impact of development on landscape quality; policies which help preserve the built and archaeological heritage; the need to protect ground water over-exploitation and the conservation and enhancement of the natural beauty, and amenity of the land, including tree and hedgerow protection and planting. These Considerations are absent from draft PPS12. If they do not appear in PPS12 or PPS1, it is essential that PPS7 does incorporate this list insofar as it applies to the countryside. In any event, PPS7 should contain clear cross-reference to the Environmental Considerations for Development Plans, wherever the Government places them in planning policy.

8. Link considers that the opacity of draft PPS7 will lead to widely varying and inconsistent decisions by local authorities that will threaten the integrity of the countryside and the habitats and species it supports.

9. In the judgement of Link, PPS7 should reassert in the clearest terms the value of the countryside in its own right, the fundamental contribution of undeveloped ordinary countryside to the viability of the habitats and wildlife of England, the quality of the English landscape, its historic character and the enjoyment of informal recreation, health, well-being and education by the nation as a whole.

GUIDING PRINCIPLES

10. Link urges the Government to structure a revised PPS7 around a set of guiding principles that are not confused with objectives or aspirations. The principles should cover comprehensively all aspects of the protection of the countryside and the relationship between development and the protection of the countryside. The 'environmental components' of the countryside, its wildlife and habitats, historic features, landscape and access to it should be equal subjects of the policy along with social and economic objectives, rather than the passive recipients of a drive for diversified development.

Link suggests the following guiding principles:

The protection of the countryside for its own sake

Recognition of the contribution of the ordinary countryside to national as well as local prosperity and well being.

The protection of the environmental resources of the ordinary, undesignated countryside, including its biodiversity, semi-natural habitats, historic features and character, landscape character, and its primary capacity for food and commodity production. The positive value of land use planning in protecting the undeveloped and unfragmented qualities of the countryside

Development in the countryside should follow the principles of sustainable development, in which the environmental considerations are clearly reflected, and respond to diverse local circumstances. Such development should contribute to the rural character of its surroundings and encourage sympathetic land use and management

The need for strict control of development in ordinary countryside, greenfield sites and previously developed sites which have developed high biodiversity or landscape value

The importance of local countryside designations and landscape character assessment in informing the location and design of development

The special importance of protecting our richest biodiversity and our finest landscapes and historic features

The establishment of the needs of rural communities, especially the provision of affordable housing in development plans and other strategies

The recognition that tourism and leisure policies depend on a high quality rural landscape and that such activity should maintain or enhance the qualities of the ordinary countryside

DETAILED COMMENTS

The protection of the countryside for its own sake

11. The objectives, as set out in draft PPS7, currently include no reference to the protecting ordinary countryside, other than '*our most valued landscapes and environmental resources*'. It is clear that, while protected landscapes are important and special, the countryside outside National Parks, AONBs and other designated sites is also of great importance both locally and nationally. The varied character and distinctiveness of the English landscape is something that people care passionately about, and should be afforded recognition in PPS7.

12. Draft PPS7 fails to address the key spatial implications of development proposals on ordinary countryside, such as the impact on the quality of the countryside in terms of clutter and spreading settlements, and effects on open space, tranquillity, dark skies, wildlife and the historic environment – the qualities that make rural areas distinctive and worth protecting

13. PPG7, in its introductory policies, describes the need to '*maintain or enhance the character of the countryside*' (1.4), later stating that '*the countryside should be safeguarded for its own sake*' (2.14). Very recently, the Secretary of State for the Environment, Food and Rural Affairs has recognised that the countryside is 'above all a national asset, valued and enjoyed by all the people of Britain'. It is important that PPS7 should recognise this vital principle in its overall objectives.

14. Draft PPS7 implies that local authorities are already protecting the countryside effectively in its phrase, 'Planning authorities should continue to protect the countryside for the sake of its intrinsic character and beauty, the diversity of its landscape and wildlife and the wealth of its natural resources' (paragraph 2,16). The new wording is an unnecessary complicating of the established PPG7 policy that 'the countryside should be safeguarded for its own sake' by specifying 'intrinsic character and beauty, the diversity of its landscapes and wildlife and the wealth of its natural resources'. It is not clear how local authorities should use this policy to protect an area of open countryside, potentially having to justify reasons under each of those particular qualities.

The landscape should be valued for its contribution to national as well as local prosperity

15. PPS7 needs to recognise from the outset the vital economic importance of the undeveloped countryside and the links between the farmed landscape and the wider economy and society in rural areas, and to the nation as a whole. It is what makes rural areas distinct and distinctive – their beautiful landscapes, wildlife, historic character, open spaces, and tranquillity, that make them so valuable to national prosperity and well being. This economic contribution that beauty and diversity brings to both rural and urban areas was clearly demonstrated by the foot and mouth outbreak of 2001. This was subsequently recognised by the report of the Policy Commission for the Future of Farming and Food, set up after the foot and mouth crisis. Previously the Rural White Paper (RWP) in 2000, stated that:

'Rural landscapes, green spaces, wildlife and the heritage features created by man's interaction with them lie at the heart of why people value the countryside so highly. They are a most precious asset'¹

16. PPG7 includes the important phrase, *'the appeal of the countryside is central to its economic prosperity'* (para 1.4) at the outset in its explanation of its interpretation of sustainable development. It is vital that PPS7 also makes clear this principle. If the draft PPS7 claims to carry the vision of the RWP in its objectives, then it needs to include the principle that the landscape should be valued, both for its aesthetic and inherent value and for the contribution it makes to national prosperity. Locally, an effectively protected landscape is an important source of rural competitive advantage.

The protection of the environmental resources of the ordinary, undesignated countryside, including its biodiversity, semi-natural habitats, landscape character, and its primary capacity for food and commodity production. The positive value of land use planning in protecting the undeveloped and unfragmented qualities of the countryside

17. Ordinary countryside has a crucial part to play in maintaining biodiversity as well as providing essential links between designated wildlife sites. Many vitally important wildlife sites are not protected by national designation. For example, only 14% of ancient woods are designated as SSSI. There should be a clear presumption against development that damages or destroys semi-natural habitats.

18. The wider value of semi-natural habitats should be recognised. The long-term viability of many protected habitats and species is dependent on significant extent of habitat adjacent to designated sites. Such areas are important in fulfilling national conservation objectives and those identified through the European Directives and international conservation conventions, such as the Convention on Biological Diversity. The forthcoming PPS9 should also deliver this message.

19. PPS7 should help ensure that the countryside is robust to and able to adapt to environmental change. For example, PPS7 should help facilitate a response to climate change, which will allow the movement of species and the adaptation of habitat in response to changing physical conditions. PPS7 should plan positively to ensure that land is available to buffer and extend semi-natural habitats by including a presumption against development in the countryside adjacent to semi-natural habitats.

20. Planning policy for the countryside should contribute towards the stated aim of the

¹ Our countryside: the future, a fair deal for rural England, November 2000, 104

England Biodiversity Strategy² (EBS) to 'ensure that construction, planning, development and regeneration have minimal adverse impacts on biodiversity and enhance it where possible'. Paragraph 2,16 of draft PPS7 should put effective emphasis on the need to presume against development if it were to be potentially damaging for locally important wildlife, as well as for landscape qualities and historic features. A much greater emphasis needs to be given to the role of planning in providing positive benefits to conservation; PPS7 should make this point explicitly.

21. Paragraph 2,17 of draft PPS7 should acknowledge the importance of the contribution of planning policies to key Habitat Action Plans and Species Action Plans. PPS7 should state that planning policies should do more than 'take account of the need to protect natural resources'. PPS7 should encourage planning decisions that contribute to key Habitat Action Plans and Species Action Plans, in line with the objectives of the EBS.

22. The redevelopment or re-use of derelict or vacant buildings addressed in draft PPS7 paragraphs 2,12 and 2,18-20, will have significant implications for many protected species. A recent study by the Bat Conservation Trust and the RSPB has found that two thirds of offences concerning the destruction or disturbance of bats over a two year period (2001, 2002) were due to building and development work. While planning authorities cannot be responsible for the integrity of developers, the protection of species is an important consideration for planning authorities. Link urges that PPS7 paragraph 2,20 includes an additional requirement that local authorities should consider the legislative requirements governing protected species, and should cross refer to PPS9.

23. Paragraph 2,28 of draft PPS7 is a retrograde weakening of the previous protection of Best and Most Versatile land. It would be a recklessly short term view to sacrifice grade 1, 2 or 3a agricultural land simply because of presently prevailing trade conditions and prices. There is also a grave risk that if land is used for development because its value in respects other than productive capacity is limited, the pressure on less productive land (richer in biodiversity or landscape or access value) for production may increase in the future. Link urges that any adverse affects arising from the development of land be avoided rather than minimised in the case of increased flood risk. There should also be a clear cross-reference to PPS25.

All development should follow the principles of sustainable development and respond to diverse local circumstances; that in the Countryside needs to take particular note of the importance of conserving the environment and its value to people and wildlife . Such development should contribute to the rural character of its surroundings and encourage sympathetic land use and management

24. PPS7 needs to make clear from the outset the principles of sustainable development that local and regional policy and decision-makers should follow in their development plans and decision-making processes. PPG7, for example, sets out its policies on sustainable development as follows:

'1.4 Sustainable development includes integrating the Government's objectives to:

- *meet the economic and social needs of people who live and work in rural areas, by promoting the efficiency and competitiveness of rural businesses, and encouraging further economic diversity to provide varied employment opportunities (especially in areas still heavily reliant on agriculture);*

² Working with the grain of nature – a biodiversity strategy for England, Defra, 2002.

- *maintain or enhance the character of the countryside and conserve its natural resources, including safeguarding the distinctiveness of its landscapes, its beauty, the diversity of its wildlife, the quality of rural towns and villages, its historic and archaeological interest, and best agricultural land;*
- *improve the viability of existing villages and market towns, reduce the need for increased car commuting to urban centres, and reverse the general decline in rural services, by promoting living communities, which have a reasonable mix of age, income and occupation and which offer a suitable scale of employment, affordable and market housing, community facilities and other opportunities; and*
- *recognise the interdependence of urban and rural policies.* (PPG7 para 1.4)

25. Although PPS7 regularly repeats its intention that *'policies are firmly based on the principles of sustainable development and the need to protect the wider, largely undeveloped countryside for the benefit of all'* (1,5); *'Decisions on development proposals should be firmly based on sustainable development principles'* (2,1); and *'The planning system must provide a positive framework for facilitating sustainable development'* (2,15) it does not make clear any reference to an interpretation of the principles of sustainable development.

26. We welcome the recognition in PPS7 of the interdependence of rural and urban areas. However, there is no recognition in draft PPS7 that the economic variation between rural areas can be as great, or greater, than that between urban and rural. There is no distinct homogeneous rural economy and there is no single set of rural problems or solutions. This understanding of rural areas is essential in order to devise effective and sustainable solutions to the diverse problems of rural England and it is important that Government policy statements should avoid using the term 'rural economy'. Link welcomes the fact that draft PPS7 does not use this phrase. PPS7 does not acknowledge in a convincing way that rural and urban areas are fundamentally distinct from one another. Interdependence of town and country does not mean we should 'suburbanise' the rural.

27. Link welcomes the removal of the damaging policy in PPG7 (paragraph 3.21) that encourages the development of new country houses. The current planning system is already flexible enough to allow truly exceptional proposals for new development in a rural setting. The policy is unnecessary: it creates a loophole that can be exploited by speculative developers; it is contrary to subsequent planning guidance; and it risks damaging the qualities of the countryside with no clear benefit to the local area.

28. Policies on agricultural developments, farm diversification and equine related developments should all be united under a strong land-use planning process. PPS7 should continue to promote the use of planning controls over farm diversification as necessary and desirable. This is reflected in the report of the Policy Commission on the Future of Farming and Food³, which highlighted the need for better advice from local planning authorities (LPAs) rather than any relaxation of planning policies as the basis of a strategy for farm diversification.

29. Equine related developments in PPS7 seem to be excluded from the same planning controls as other farm diversification. The General Permitted Development Order⁴ is ambiguous on the relationship between equine related activity and agriculture. PPS7 should make a clear statement of policy which protects the countryside from a ragged edge of 'horsiculture'. It is important that such developments are considered under the premise of the sustainable development principles set out at the beginning of this paper, based on a sound Landscape

³ "Land use planning has an important role in reconciling diversification with wider land use and transport policies" p 54, Farming and Food: a sustainable future, January 2002.

⁴ General Permitted Development Order, Part 6, Agricultural buildings and operations.

Character Assessment and local needs audit. Equine related development and associated tourist accommodation are often over provided and local needs audits can identify opportunities that actually meet the needs of local people as well as taking account of environmental constraints and opportunities.

30. PPS7 also needs to make clear in its objectives that 'development' is about more than just new physical infrastructure. Past emphasis has been on the perceived barrier that the planning system constructs to hinder 'development' and the need to weaken planning policies to further social and economic progress. This is despite the fact that the real constraints are constantly identified as 'softer' development needs, such as training, childcare, public transport, access to finance or business advice. PPS7 should not promote new physical developments to overcome perceived problems but should be setting out objectives which seek to encourage an approach which:

- identifies the potential that rural areas have to 'develop' and meet their own needs without having to be reliant on urban solutions or the national economy;
- encourages policies to be tailored at local and regional level to respond to proven local needs rather than seeking to impose ready made solutions from the outside, recognising that new physical development is not always the most successful or sustainable solution;
- builds the capacity of rural communities to develop their own solutions and participate in any emerging opportunities by identifying and overcoming barriers to participation;
- recognises and uses environmental and local distinctiveness and character of the rural areas as an economic and social asset which provides opportunities and competitive advantage, rather than as a constraint to be overcome or as an additional (secondary) consideration. Development in rural areas should contribute to a sense of local identity and regional diversity, and be of an appropriate design and scale for its location (see PPG7 paragraph 2.11)
- strengthens local economic links and interdependence by facilitating better connection between local producers, suppliers, retailers and consumers; and
- rejecting development which will damage the local environment and undermine sustainable rural economic activity, or which accelerates migration from urban to rural areas.

The need for strict control of development in ordinary countryside, greenfield sites and previously developed sites which are situated in the countryside or have developed high biodiversity or landscape value

31. Link is concerned that the rewording of the phrase in PPG7, '*Building in the countryside...should be strictly controlled*' (2.3). PPS7 states that '*New development away from existing settlements...should be strictly controlled*' (2,1iv). This is a clear weakening of the previous policy and could, at the very least, risk incremental growth around existing settlements. The wording in PPG7 should be reinstated, or a stronger wording inserted at 2,1 iv, which establishes the vital need to retain readable and proportionate settlement patterns and a clear distinction between developed and undeveloped landscape.

32. The sequential tests for development set out in PPG3 (Housing) and PPG6 (Retail and Leisure) should be reinforced by cross reference in PPS7. Link urges that PPS7 prevents previous development which is poorly sited in terms of modern standards, perpetuating a pattern of development which would damage the countryside and encourage excessive travelling for those using such sites. New development which clearly matches identified and

proven local needs should be situated within existing towns and villages and be accessible by public transport, walking and cycling. Paragraph 2,1(v) is phrased weakly and equivocally at present. The phrase 'perform so poorly in terms of sustainability' implies a miserably low aspiration for applying sustainability criteria.

33. Link is very concerned by what is clearly a relaxation of Green Belt policies by the addition of farm diversification to the 'very special circumstances' required by PPG2 for granting permission for development in the Green Belt (2,30 (iii)). Together with the section entitled 'The countryside around cities and towns' (2,26), the position of PPS7 on the Green belt is very confused and damagingly so. PPS7 should grasp the fundamental point that is set out in 2,26 'recognising (the importance of the Green Belt) to those who live and work (around all urban areas) and also in providing the nearest and most accessible countryside to urban residents'. The equivocal statements on diversification and 'special circumstances' should be dropped.

34. Previously developed sites that have acquired a high biodiversity or landscape value should be protected from development. Often, such sites will be in open countryside or outside the envelope of a settlement. PPS7 should acknowledge what is now a well known phenomenon: the great potential of some previously developed sites as habitat, for wildlife, as sites of archaeological and historic interest and as contributors to local landscape character. This should be acknowledged in the section presently entitled 'Key Principles' (2,1).

35. Link considers that PPS7 should set out an effective site evaluation process which prioritises considerations in preparation of development plans, site allocation and assessment of individual applications. Such a process could be included as an annex to PPS7 in order to respect the Government's desire to keep PPS7 shorter than PPG7. Link has suggested that an effective test would be to require the following process to be undertaken:

- identify and seek to enhance, or protect, important environmental features;
- consider potential impacts (direct, indirect and cumulative) on the environment likely to result from policy and development proposals (using SEA and Environmental Assessment (EA) where appropriate) then:
- avoid adverse impacts, exploring all available options, including doing nothing;
- seek to improve environment through new development or land use change;
- mitigate any residual adverse impacts where development is considered to be necessary i.e. where no alternative solutions are available; where adverse impacts cannot be avoided; and where over-riding economic or social interests have been demonstrated, which outweigh the need to conserve or enhance sites; and
- always, and as a last resort, compensate for adverse impacts⁵

Link does not consider that draft PPS7 contains a sequential test that is effective enough to prevent the wasteful use of greenfield sites in ordinary countryside.

36. Link is concerned that paragraph 2,12 states that the re-use of farm buildings in the countryside will be acceptable for housing purposes. PPG7 contained welcome emphasis on giving priority to farm building conversions for economic rather than residential use. PPS7 should encourage an approach that is compatible with the principles of sustainable development and favours linking economic use in the countryside with sustainable land use. Aspects of this question are also addressed in our comments on Annex A.

⁵ Link, A modern countryside for wildlife and the countryside, 1999.

The importance of local countryside designations and landscape character assessment in informing the location and design of development

37. Link is gravely concerned that the Government appears to regard local countryside designations as unnecessary. Link believes this view overlooks both the importance and the greatly improved rigour of the justification of local wildlife sites and landscape character areas. Local landscape designations are increasingly based on rigorous landscape assessments, they are fundamental to protecting the countryside and managing change, and there is no evidence that such designations restrict appropriate development.

38. In the view of Link, paragraph 2,25 should be rewritten to acknowledge the complementary role of local wildlife designations and policies for statutorily protected sites. This paragraph should also have a clear cross reference to PPS9 and PPS15.

39. Link recognises that the test for local countryside designations of various kinds could be improved (paragraph 4.16 of PPG7). It has sometimes proved difficult to apply in practice and could be replaced by an approach that requires a robust justification for local designations through landscape assessments. This should be complemented by a requirement for local authorities to adopt a landscape character approach to inform both spatial planning and development control decisions. Local landscape character assessments should also be used more widely to inform the targeting of agri-environment schemes, improvement of public access to the countryside, economic strategies and design guidance.

40. Discontinuing the use of rigorously justified local landscape designations should only happen once an alternative framework based on Landscape Character Assessment is established and its role in informing the restriction of development confirmed.

41. Link welcomes the mention of tools such as Landscape Character Assessment and Village Design Statements. It is disappointing that the relevant section of draft PPS7 (2,14) is so insubstantial by comparison with the section of PPG7 (paragraphs 2.14 and 2.15). Link considers that if PPS7 is to be effective in protecting the character of the countryside, the role of Landscape Character Assessment, Village Design Statements and other similar tools should be properly set out in PPS7 or in a related appendix.

42. These tools should be a major influence on spatial planning and should not be limited to considerations only of design. Landscape Character Assessments are vital for understanding the countryside, engaging the community and influencing development plans and decisions. We would like to see much stronger support for the countryside character approach to spatial planning and the importance of the beauty, diversity and tranquillity of the countryside. The Rural White Paper endorses Countryside Character and the importance of beauty, diversity and tranquillity. PPS7 should require local authorities to carry out and use landscape character assessments to inform policies on all aspects of rural development. PPS7 should also require planning authorities to develop policies to protect remaining areas of rural tranquillity and dark skies, and to promote better quality design through the adoption of Village Design Statements and Landscape Character Assessments. These documents should be of significance and ought to carry the weight of existing Supplementary Planning Guidance.

The special importance of protecting our richest biodiversity and our finest landscapes

43. Link urges that the wording of paragraph 2,23 is amended to reflect National Parks and AONBs' status in the planning system. Both National Parks and AONBs enjoy the *highest status* of protection (rather than just 'great weight') in terms of landscape and scenic beauty as reinforced by the Countryside and Rights of Way Act 2000 and as set out in the current PPG7 and Circular 12/96.

44. PPS7 does not, as Link had hoped, clarify the wording of the test for major developments in National Parks and AONBs. This should set out clearly the process for assessing national need and alternatives⁶ and should remove the apparent equivalence between national need and local economic considerations. There should also be new safeguards against damaging proposals in the areas adjacent to National Parks and AONBs where the setting of these nationally designated landscapes would be adversely affected.. Planning authorities should be encouraged to introduce criteria-based planning policies which would ensure the protection of the setting of National Parks and AONBs. This would be compatible with their statutory duty to have regard to the purposes of National Park and AONB designation⁷;

45. The definition of a 'major development' should be clearer and should be related to the scale of the development and the impact which it would have on the statutory purposes of the area. There are a number of major developments that fall outside the planning system (such as extensive overhead wires) and it is important that ODPM considers ways to deal with these potential threats to the statutory purposes of National Parks and AONBs.

The establishment of the needs of rural communities, especially the provision of affordable housing in development plans and other strategies

46. Link believes that more emphasis should be placed on the need for stronger local involvement in rural policy decisions, while recognising the importance of a national perspective for ensuring the important rural, and biodiversity and historic interests are maintained.. It is important, in this respect, not to underestimate the value of conventional planning processes, such as consultation on draft policies and planning decisions, led by elected local authorities with a democratic mandate. Link also strongly supports other participatory processes such as local Landscape Character Assessments, Parish Plans, Village Design Statements and Village Appraisals. We would like to see far greater emphasis given to these mechanisms, and the value they bring to legitimising the plan and decision making process in PPS7.

47. PPS7 should seek to improve the way the planning process can be used to stimulate sustainable economic development, and prevent development which does not enhance the rural qualities of the area and might be located elsewhere. Securing affordable housing, where strictly appropriate for local need, is important. Link welcomes the emphasis on the obligation upon local planning authorities to be aware of social and economic needs of rural communities and businesses in their area, and, where they do not have this information available, collecting it. However, we feel this requirement should be made more robust, requiring local authorities to undertake local 'needs audits' as a precursor to preparing development plans and making planning decisions, so that they can assess the match between development proposals and rural needs, and set clear plan objectives. It is important that such audits are accountable, and we therefore suggest that PPS7 includes guidance on the terms of reference for local needs audits.

48. The importance of securing affordable housing should not lead to its location where it will damage the landscape or wildlife interest of the countryside. Paragraph 2,9, remains worryingly vague on this count. Paragraph 2,10 should make it clear that PPS7 does not countenance building affordable houses where other development would not be acceptable.

⁶ The decision to approve the expansion and intensification at the Otterburn Military Training area in the Northumberland National Park is an illustration of the need for this.

⁷ Section 62 of the Environment Act 1995 and Section 85 of the Countryside and Rights of Way Act 2000

The recognition that tourism and leisure policies depend on a high quality rural landscape and that such activity should maintain or enhance the qualities of the ordinary countryside

49. The section of draft PPS7 which addresses tourism, 'Tourism and leisure' paragraph 2,34, does not recognise that the tourism and leisure activities that often sustain rural economies are largely dependent upon a high quality rural landscape and its historic character. Maintaining such quality and the clear distinction between rural and urban places should be foremost in this section of PPS7. There is also no recognition in the draft of the need to differentiate between different types of activity in the countryside. Link suggests PPS7 should emphasise the value of the countryside as a 'natural health service', where people escape their busy lives to quietly enjoy open space, healthy exercise in attractive surroundings, beautiful views, dark skies and tranquillity.

50. Link welcomes paragraph 2,34(i), but sees the following paragraph as undermining its intent. Paragraph 2,34(ii) should include the ordinary countryside as well as statutorily protected areas. PPS7 should recognise that many high quality landscapes, places of nature conservation interest or historical importance which do not have statutory designation might be adversely affected by tourism developments.

51. It is important that, if PPS21 (Tourism) is to be abolished, then the key aspects of that policy relating to the countryside are integrated in PPS7.

ANNEX A: AGRICULTURAL, FORESTRY AND OTHER OCCUPATIONAL DWELLINGS

52. Link strongly opposes the provisions for building '**Other occupational dwellings**' in open countryside, for two main reasons:

- it provides a completely new provision for housing that is associated with 'rural based enterprises'. This implies that these enterprises need not have a link with the land and may have no requirement for a rural location. This is suggesting, therefore, that accommodation can be considered for rural based enterprises that do not require that rural location and may not be contributing to the quality and sustainability of the rural environment and landscape; and
- the criteria applied to agricultural and forestry dwellings is appropriately clear and focused to avoid speculative developments. However, this criterion is only applied to rural based enterprises '*as far as they are appropriate*'. This effectively means that the test is much weaker than that for a farm or a forestry application. For example, it is difficult to see how the *functional test* in criteria 4, which refers to the need to provide essential, emergency care to animals or plants, would be applied to 'rural based enterprises'. It should not be easier to have an application accepted for a non-agricultural dwelling than for agricultural one.

53. Link believes that this addition to draft PPS7 could lead to a large number of speculative applications from landowners who wish to profit from the sale of a house at market prices, undermines the attractiveness and ability of applications for agricultural and forestry related activity, and should be removed from the final PPS7.